

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|--|---|---------------------------------|
| In re: | : | |
| | : | Case No.: 20-11639 |
| Phyllice J. Jackson | : | Chapter 13 |
| | : | Judge Ashely M. Chan |
| Debtor(s) | : | * * * * * |
| | : | |
| Phyllice J. Jackson | : | Date and Time of Hearing |
| Kenneth E. West | : | _____ |
| | : | |
| Movant, | : | Related Document No. 60 |
| vs | : | |
| | : | |
| Metropolitan Life Insurance Company | : | |
| Respondents. | : | |

**OBJECTION OF METROPOLITAN LIFE INSURANCE COMPANY TO THE MOTION
TO MODIFY PLAN (DOCKET NUMBER 60)**

Metropolitan Life Insurance Company ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed motion to modify plan ("Plan") filed by Phyllice J. Jackson ("Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 1502 Walnut Ridge Estate, Pottstown, PA 19464 ("Property").
2. Creditor filed an Amended Proof of Claim in the amount of \$129,864.94. This amount includes a prepetition arrearage in the amount of \$3,870.61.
3. Debtor's Plan does not provide for payment of the entire prepetition arrearage due on Creditor's claim. Debtor's plan lists \$1,809.87 as the arrearage to be paid by the Trustee to Creditor instead of \$3,870.61 as listed by Creditor in the filed Amended Proof of Claim.
4. At this time, Creditor has not offered a permanent loan modification agreement to Debtor.

5. Debtor's Plan represents an impermissible modification of Creditor's claim and a violation of 11 U.S.C. §§1322 and 1325.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Motion to Modify Plan.

Respectfully submitted,

/s/ Adam B. Hall

Adam B. Hall, Esquire (323867)
Alyk L. Oflazian (312912)
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Attorneys for Creditor
The case attorney for this file is Adam B. Hall.
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| | : | |

CERTIFICATE OF SERVICE

I certify that on the date of filing, a copy of the foregoing Objection of Metropolitan Life Insurance Company to the Motion to Modify Original Plan was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Kenneth E. West, Chapter 13 Trustee, ecfemails@ph13trustee.com

JOSEPH L QUINN, Attorney for Phyllice J. Jackson, CourtNotices@rqplaw.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

Phyllice J. Jackson, 1502 Walnut Ridge Estates, Pottstown, PA 19464

Bayview Loan Servicing, 4425 Ponce De Leon Blvd, Coral Gables, FL 33146

Lower Pottsgrove Authority, PO Box 2343, West Chester, PA 19380-0110

Midland Funding, C/O Hayt, Hayt & Landau, LLC, 400 Market Street, 6th Floor, Philadelphia, PA 19106

/s/ Adam B. Hall
